

To: Dermer, Michele[Dermer.Michele@epa.gov]
From: Smith, Robert-Eu
Sent: Mon 3/2/2015 7:50:25 PM
Subject: Public comment to the 1st UIC ICR relative to CADOGG
[Letter to Jared Blumenfeld, USEPA September 15, 2014.pdf](#)
[Letter to Elena Miller, Department of Conservation, 7 18 11.pdf](#)
[ICR-FRN Comment on CDOGG--8-8-14.pdf](#)
[Letter to Matt Rodriguez Rodriguez, USEPA 07 17 14.pdf](#)

Good morning Michele. Attach is a public comment received to the proposed UIC Program Information Collection Request Federal Register Notice that was published August 8, 2014. The comment period to the Notice closed on October 7, 2014. While this commenter supposedly met the deadline of October 2, 2014, the comment wasn't posted to the Federal Docket Management System until October 23, 2014. This was 16 days later than it should have been by the HQ docket specialist. In any event, I determined that the comment did not meet the requirements to be addressed in the second FRN published on December 29, 2014, in which the comment period closed on January 28, 2015. The FRN ask commenters to address the following of the Federal Register Notice:

1. EPA is soliciting comments and information to enable it to evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;
2. Evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
3. Enhance the quality, utility and clarity of the information to be collected;
4. Minimize the burden of the collection of the information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses.

Only two comments including this was received for both FRNs. Neither addressed the information being requested. These attachment are being sent to you, albeit late, as it not something that can be addressed to the FRN because it is more specific to issues this NGO (Center for Biological Diversity) has with CADOGG's UIC program. You will note the attached letters. The proposed ICR published in August 2014 was looking for information relative to more big picture items such as methodology, assumptions, burden and cost, utility of the information to be collected, quality, clarity, burden reduction, etc.

Whether Region 9 chooses to respond to this comment is at its discretion. I only pass unrelated IRC comments to EPA Regions if there is a state, DI, or territory mentioned as a courtesy. My obligation is to address relevant comments and amend the ICR as appropriate.

If you have any questions, please don't hesitate to call me at 202-564-3895.